Missouri Department of Natural Resources

PUBLIC NOTICE

DRAFT MISSOURI STATE OPERATING PERMIT

DATE: August 4, 2006

In accordance with the state Clean Water Law, Chapter 644, RSMo, Clean Water Commission regulation 10 CSR 20-6.010, and the federal Clean Water Act, the applicants listed herein have applied for authorization to either discharge to waters of the state or to operate a no-discharge wastewater treatment facility. The proposed permits for these operations are consistent with applicable water quality standards, effluent standards and/or treatment requirements or suitable timetables to meet these requirements (see 10 CSR 20-7.015 and 7.031). All permits will be issued for a period of five years, unless noted otherwise in the Public Notice for that discharge.

On the basis of preliminary staff review and the application of applicable standards and regulations, the Missouri Department of Natural Resources (MDNR), as administrative agent for the Missouri Clean Water Commission, proposes to issue a permit(s) subject to certain effluent limitations, schedules, and special conditions. The proposed determinations are tentative pending public comment.

Persons wishing to comment on the proposed permit conditions are invited to submit them in writing to the Department of Natural Resources, Water Protection Program, P.O. Box 176, Jefferson City, Missouri 65102, ATTN: NPDES Permits and Engineering Section / Permit Comments. **Please include the permit number in all comment letters.**

Comments should be confined to the issues relating to the proposed action and permit(s) and the effect on water quality. The MDNR may not consider as relevant comments or objections to a permit based on issues outside the authority of the Clean Water Commission, (see Curdt v. Mo. Clean Water Commission, 586 S.W.2d 58 Mo. App. 1979).

All comments must be postmarked by September 4, 2006 or received in our office by 5:00 p.m. on September 7, 2006. The requirement of a signed document makes it impossible to accept email comments for consideration at this time. Comments will be considered in the formulation of all final determinations regarding the applications. If response to this notice indicates significant public interest, a public meeting or hearing may be held after due notice for the purpose of receiving public comment on the proposed permit or determination. Public hearings and/or issuance of the permit will be conducted or processed according to 10 CSR 20-6.020.

Copies of all draft permits and other information including copies of applicable regulations are available for inspection and copying at DNR's website, http://www.dnr.mo.gov/env/wpp/index.html, or at the Department of Natural Resources, Water Protection Program, P.O. Box 176, Jefferson City, Missouri 65102, between the hours of 8:00 a.m. and 5:00 p.m., Monday through Friday.

Public Notice Date: August 4, 2006
Permit Number: MO-0115631
Southwest Regional Office

FACILITY NAME AND ADDRESS	NAME AND ADDRESS OF OWNER
Facility Name: KCSRC, Neosho Yard Mechanical Facility Facility Address: 211 East Coler, Neosho, MO 64850	Owner: Kansas City Southern Railway Company (KCSRC) Address: 427 West 12th Street, Kansas City, MO 64105
RECEIVING STREAM & LEGAL DESCRIPTION	**TYPE OF DISCHARGE**
Receiving Stream: Unnamed Tributary to Hickory Creek (U) Legal Description: NE ¼, SW ¼, Sec. 19, T25N, R31W, Newton County	

STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES

MISSOURI CLEAN WATER COMMISSION

MISSOURI STATE OPERATING PERMIT

In compliance with the Missouri Clean Water Law, (Chapter 644 R.S. Mo. as amended, hereinafter, the Law), and the Federal Water Pollution Control Act (Public Law 92-500, 92nd Congress) as amended,

Permit No.	MO-0115631
Owner:	Kansas City Southern Railway Company (KCSRC)
Address:	427 West 12th Street, Kansas City, MO 64105
Continuing Authority:	Same as above
Address:	Same as above
Facility Name:	KCSRC, Neosho Yard Mechanical Facility
Facility Address:	211 East Coler, Neosho, MO 64850
Legal Description:	NE ¼, SW ¼, Sec. 19, T25N, R31W, Newton County
Latitude/Longitude:	+3652198/-09421571
Receiving Stream:	Unnamed Tributary to Hickory Creek (U)
First Classified Stream and ID:	Hickory Creek (P) (03226)
USGS Basin & Sub-watershed No.:	(11070207 - 170001)

is authorized to discharge from the facility described herein, in accordance with the effluent limitations and monitoring requirements as set forth herein:

FACILITY DESCRIPTION

Outfall #s 001, 002 & 003 – Industrial stormwater- SIC # 4011
Stormwater runoff from a railway maintenance yard used for parts storage, diesel engine fueling, maintenance and track service and repairs.
Flow depends upon rainfall

This permit authorizes only wastewater discharges under the Missouri Clean Water Law and the National Pollutant Discharge Elimination System; it does not apply to other regulated areas. This permit may be appealed in accordance with Section 644.051.6 of the Law.

Effective Date

Doyle Childers, Director, Department of Natural Resources
Executive Secretary, Clean Water Commission

Expiration Date

Edward Galbraith, Director of Staff, Clean Water Commission

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

The permittee is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. The final effluent limitations shall become effective upon issuance and remain in effect until expiration of the permit. Such discharges shall be controlled, limited and monitored by the permittee as specified below:

(OUTFALL NUMBER AND EFFLUENT PARAMETERS)	UNITS	FINAL EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Outfall #'s 001*, 002* and 003						
Rainfall	inches/day	**		**	Once/ Quarterly***	24 Hour Est.
Flow	MGD	**		**	Once/ Quarterly***	24 Hour Est.
Temperature	ºC	**		**	Once/ Quarterly***	Grab
pH – Units	SU	****		****	Once/ Quarterly***	Grab
Chemical Oxygen Demand	mg/L	**		**	Once/ Quarterly***	Grab
Total Suspended Solids	mg/L	**		**	Once/ Quarterly***	Grab
Settleable Solids	ML/L/hr.	1.5		1.0	Once/ Quarterly***	Grab
Oil & Grease	mg/L	15		10	Once/ Quarterly***	Grab
Total Petroleum Hydrocarbons	mg/L	10		10	Once/ Quarterly***	Grab
Benzo(a) anthracine	µg/L	0.08		0.04	Once/ Quarterly***	Grab
Benzo(a) pyrene	µg/L	0.08		0.04	Once/ Quarterly***	Grab
Benzo(k) fluoranthene	µg/L	0.08		0.04	Once/ Quarterly***	Grab
Chrysene	µg/L	0.08		0.04	Once/ Quarterly***	Grab
Indeno(1,2,3 – cd) pyrene	µg/L	0.08		0.04	Once/ Quarterly***	Grab
Phenols	µg/L	164		82	Once/ Quarterly***	Grab

MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE _____. THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

Total Toxic Organics (Note 1)	mg/L	**		**	Once/ 5 years

MONITORING REPORTS SHALL BE SUBMITTED Once/ 5 YEARS; THE FIRST REPORT IS DUE _____. THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

B. STANDARD CONDITIONS

IN ADDITION TO SPECIFIED CONDITIONS STATED HEREIN, THIS PERMIT IS SUBJECT TO THE ATTACHED Parts I & III STANDARD CONDITIONS DATED October 1, 1980 and August 15, 1994, AND HEREBY INCORPORATED AS THOUGH FULLY SET FORTH HEREIN.

MO 780-0010 (8/91)

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (Continued)

* Samples should be collected near the top of the drop inlet before stormwater from the site mixes with other waters and on the side of the inlet where stormwater from the site is entering.

** Monitoring requirement only.

*** Measure Quarterly during the months of March, May, August and November.

**** pH is measured in pH units and is not to be averaged. The pH is limited to the range of 6.0 to 9.0 pH units.

Note 1 – If any constituent of the total toxic organics test is found to be in a quantity greater than the chronic or acute criteria of the Missouri water quality standards, 10 CSR 20-7.031 Table A, appropriate control measures to correct the excursion shall be taken by the permittee. The test should be conducted near the start of the 2nd year of the 5 year permit life.

Total Toxic Organics (Note 1)

Acenaphthene
Acrolein
Acrylonitrile
Benzene
Benzidine
Carbon Tetrachloride (tetrachloromethane)
Chlorobenzene
1,2,4-trichlorobenzene
Hexachlorobenzene
1,2-dichloroethane
1,1,1-trichloroethane
Hexachloroethane
1,1-dichloroethane
1,1,2-trichloroethane
1,1,2,2-tetrachloroethane
Chloroethane
Bis (2-chloroethyl) ether
2-chloroethyl vinyl ether
N-nitrosodi-n-propylamine
Pentachlorophenol
Phenol
Bis (2-ethylhexyl) phthalate
Butyl benzyl phthalate
Di-n-butyl phthalate

Di-n-octyl phthalate
Diethyl phthalate
Dimethyl phthalate
1,2-benzanthracene (benzo(a)anthracene)
Benzo(a)pyrene (3,4-benzopyrene)
3,4-benzofluoranthene (benzo(b)fluoranthene)
11,12-benzofluoranthene (benzo(k)fluoranthene)
Chrysene
Anthracene
1,12-benzoperylene (benzo(ghi)perylene)
Fluorene
2-chloronaphthalene
2,4,6-trichlorophenol
Parachlorometa cresol
Chloroform (trichloromethane)
2-chlorophenol
1,2-dichlorobenzene
1,3-dichlorobenzene
1,4-dichorobenzene
3,3-dichlorobenzidine
1,1-dichloroethylene
1,2-trans-dichloroethylene
2,4-dichlorophenol
1,2-dichloropropane (1,3-dichloropropane)
2,4-dimethylphenol
2,4-dinitrotoluene
2,6-dinitrotoluene
1,2-diphenylhydrazine
Ethylbenzene
Fluoranthene
4-chlorophenyl phenyl ether
4-bromophenyl phenyl ether
Bis (2-chloroisopropyl) ether
Bis (2-chloroethoxy) methane
Methylene Chloride (dichloromethane)
Methyl Chloride (chloromethane)
Methyl bromide (bromomethane)
Bromoform (tribromomethane)
Dichlorobromomethane
Chlorodibromemethane
Hexachlorobutadiene
Hexachlorocyclopentadiene
Isophorone
Naphthalene
Nitrobenzene
2-nitrophenol
4-nitrophenol
2,4-dinitrophenol
4,6-dintro-o-cresol
N-nitrosodimethylamine
N-nitrosodiphenylamine
Phenanthrene
1,2,5,6-dibenzanthracene (dibenzo(a,h)anthracene)
Indeno (1,2,3-cd) pyrene
(2,3-o-phenylene pyrene)
Pyrene
Tetrachloroethylene
Toluene
Trichloroethylene
Vinyl Chloride (chloroethylene)
Aldrin
Dieldrin
Chlordane (technical mixture and metabolites)
4,4-DDT
4,4-DDE (p,p-DDX)
4,4-DDD (p,p-TDE)
Alpha-endosulfan
Beta-endosulfan
Endosulfan sulfate
Endrin
Endrin aldehyde
Heptachlor
Heptachlor epoxide (BHC hexachlorocyclohexane)
Alpha-BHC
Beta-BHC
Gamma-BHC
Delta-BHC (PCB polychlorinated biphenyls)
PCB-1242 (Arochlor 1242)
PCB-1254 (Arochlor 1254)
PCB-1221 (Arochlor 1221)
PCB-1232 (Arochlor 1232)
PCB-1248 (Arochlor 1248)
PCB-1260 (Arochlor 1260)
PCB-1016 (Arochlor 1016)
Toxaphene

C. SPECIAL CONDITIONS

1. This permit may be reopened and modified, or alternatively revoked and reissued, to:
   a. Comply with any applicable effluent standard or limitation issued or approved under Sections 301(b)(2)(C) and (D), 304(b)(2), and 307(a) (2) of the Clean Water Act, if the effluent standard or limitation so issued or approved:
      (1) contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
      (2) controls any pollutant not limited in the permit.
   b. Incorporate new or modified effluent limitations or other conditions, if the result of a waste load allocation study, toxicity test or other information indicates changes are necessary to assure compliance with Missouri's Water Quality Standards.
   c. Incorporate new or modified effluent limitations or other conditions if, as the result of a watershed analysis, a Total Maximum Daily Load (TMDL) limitation is developed for the receiving waters which are currently included in Missouri's list of waters of the state not fully achieving the state's water quality standards, also called the 303(d) list.

   The permit as modified or reissued under this paragraph shall also contain any other requirements of the Clean Water Act then applicable.

2. All outfalls must be clearly marked in the field.

3. Permittee will cease discharge by connection to areawide wastewater treatment system within 90 days of notice of its availability.

4. Changes in Discharges of Toxic Substances.
   The permittee shall notify the Director as soon as it knows or has reason to believe:
   a. That any activity has occurred or will occur which would result in the discharge of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels:"
      (1) One hundred micrograms per liter (100 µg/L);
      (2) Two hundred micrograms per liter (200 µg/L) for acrolein and acrylonitrile; five hundred micrograms per liter (500 µg/L) for 2,5 dinitrophenol and for 2-methyl-4, 6-dinitrophenol; and one milligram per liter (1 mg/L) for antimony;
      (3) Five (5) times the maximum concentration value reported for the pollutant in the permit application;
      (4) The level established in Part A of the permit by the Director.
   b. That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant, which was not reported in the permit application.
   c. That the effluent limit established in part A of the permit will be exceeded.

5. Report as no-discharge when a discharge does not occur during the report period.

6. Water Quality Standards.
   a. Discharges to waters of the state shall not cause a violation of water quality standards rule under 10 CSR 20-7.031, including both specific and general criteria.
   b. General Criteria. The following general water quality criteria shall be applicable to all waters of the state at all times including mixing zones. No water contaminant, by itself or in combination with other substances, shall prevent the waters of the state from meeting the following conditions:
      (1) Waters shall be free from substances in sufficient amounts to cause the formation of putrescent, unsightly or harmful bottom deposits or prevent full maintenance of beneficial uses;
      (2) Waters shall be free from oil, scum and floating debris in sufficient amounts to be unsightly or prevent full maintenance of beneficial uses;
      (3) Waters shall be free from substances in sufficient amounts to cause unsightly color or turbidity, offensive odor or prevent full maintenance of beneficial uses;
      (4) Waters shall be free from substances or conditions in sufficient amounts to result in toxicity to human, animal or aquatic life;
      (5) There shall be no significant human health hazard from incidental contact with the water;
      (6) There shall be no acute toxicity to livestock or wildlife watering;
      (7) Waters shall be free from physical, chemical or hydrologic changes that would impair the natural biological community;
      (8) Waters shall be free from used tires, car bodies, appliances, demolition debris, used vehicles or equipment and solid waste as defined in Missouri's Solid Waste Law, section 260.200, RSMo, except as the use of such materials is specifically permitted pursuant to section 260.200-260.247.

Date of Fact Sheet: June 19, 2006

Date of Public Notice:

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT
FACT SHEET

This Fact Sheet explains the applicable regulations, rationale for development of this permit and the public participation process.

NPDES PERMIT NUMBER: MO-0115631

FACILITY NAME: KCSRC, Neosho Yard Mechanical Facility

OWNER NAME: Kansas City Southern Railway Company

LOCATION: NE¼, SW¼ Sec. 19, T25N, R31W; Newton County:

RECEIVING STREAM: Tributary to Hickory Creek

FACILITY CONTACT PERSON: Chester Culley, General Director Environmental Quality TELEPHONE: (816) 983 - 1343

FACILITY DESCRIPTION AND RATIONALE

The Kansas City Southern Railway Company maintenance yard in Neosho, Missouri has undergone considerable modifications since the 1980's. Maintenance buildings located on the site have been removed, the site appears to have been graded and much of the property formerly belonging to the railroad now belongs to the City of Neosho. However, there continue to be several structures on-site; an office building, a house trailer, an old freight car and a couple of open – bed trailers. There is an aboveground fuel tank, about 150 gallons capacity, inside a plastic overflow containment at the west-end of the freight car. There are two piles of railroad crossties on the site. One pile is located on the northwest-side of Coler Street, near the North fence line, and the other on the Southeast-side of Coler Street, near the southeast-end of the site. A chain link fence has been constructed along the north boundary of the reconfigured site and A red clay/ gravel road has been constructed along the north-edge of the fence, by the City/ Parks department. The area between the remaining railroad property and Hickory Creek, which runs approximately parallel to the East/ West axis of the railroad property, has been converted to a park with ball fields and other amenities for children and families. Some track maintenance and engine maintenance activities are still conducted on the railroad site, but more on an emergency basis than on a scheduled basis. The areas of concern, relative to state water quality standards are the northwest-end of the site, where earlier maintenance activities were concentrated, and a pile of creosote impregnated crossties remain(monitoring point 003), the central part of the site where an underground culvert crosses the site, bringing water, which has been found to be contaminated from activities off-site, through the railroad property. The north-end of the culvert, formerly an open-ditch, has been enclosed in a concrete pipe. Openings (drop inlets) have been left near the center of the railroad property (formerly outfall 001) and north of the fence line on what is now City of Neosho property. As a result of the changes in configuration, use and ownership of the subject property (ies) Outfalls 001 and 003 representing the monitoring points selected for this permit cycle will be slightly off-site and near the fence along the north property boundary and have been selected to test the stormwater which has been in contact with the railroad crossties on the West end of the property and the service maintenance and fueling activities which have occurred, and may still occur near the center of the site. Outfall 002 is the drop inlet to a culvert crossing the east-end of the site and monitors the stormwater which may have been in contact with the crosstie pile on the east-end of the site. The selected monitoring points are shown on the drawing attached below.

Rationale for Permit Limitations.
See Water Quality Review Sheet prepared on June 16, 2006

This permit will be issued for a period of five years.

Missouri Department of Natural Resources
Water Protection Program
Water Pollution Control Branch
NPDES Permits and Engineering Section

Water Quality Review Sheet
Determination of Effluent Limits

Facility Information

FACILITY NAME: Kansas City Southern Railway Co. – Neosho Yard Mechanical Facility NPDES #: MO-0115631

FACILITY TYPE/DESCRIPTION: 001 – Stormwater discharge monitored at drop inlet to culvert northeast of fence line.
002 – Stormwater discharge monitored at drop inlet to culvert near southeast-end of site.
003 – Stormwater discharge monitored at ditch northeast of fence line near crosstie storage pile

ECOREGION: Central Irregular Plains Interior River Valleys and Hills Ozark Highlands 8- DIGIT HUC: 11070207 COUNTY: Newton

LEGAL DESCRIPTION: 001- NE¼, SW¼, Sec 19, T25N, R31W LATITUDE/LONGITUDE: 3652198/-09421571
002 - NE¼, SW¼, Sec 19, T25N, R31W 3652114/-09421506
003 - NE¼, SW¼, Sec 19, T25N, R31W 3652246/-09422001

WATER QUALITY HISTORY: Few non-compliance issues other than non-reporting; however the consultant reports a change in monitoring point due to realization that most of water sampled at 001 was from off-site. There is no correspondence in file to allow or approve of monitoring relocationand since most monitoring data was recorded from samples of water generated off-site, and the new data is from an unapproved site, there are few, if any, credible monitoring results.

Outfall Characteristics

OUTFALL	DESIGN FLOW (CFS)	TREATMENT TYPE	RECEIVING WATERBODY	OTHER
001	varies	none	ditch/pipe to Hickory Creek	U
002	varies	none	ditch/pipe to Hickory Creek	U
003	varies	none	ditch/pipe to Hickory Creek	U

Receiving Waterbody Information

WATERBODY	CLASS	7Q10(CFS)	*DESIGNATED USES	OTHER CHARACTERISTICS
Tributary to Hickory Creek	U	0	General Criteria	
Hickory Creek	P	3.9	LWW, AQL, WBC	WBID: 3226

*Cool Water Fishery (CLF), Cold Water Fishery (CDF), Irrigation (IRR), Industrial (IND), Boating & Canoeing (BTG), Drinking Water Supply (DWS), Whole Body Contact Recreation (WBC), Protection of Warm water Aquatic Life and Human Health (AQL), Livestock & Wildlife Watering (LWW)

COMMENTS: Stormwater runoff from railroad maintenance yard. Approximately 300 yards to Hickory Creek. Discharge enters creek in midst of park frontage.

MIXING CONSIDERATIONS

Mixing Zone (MZ): Not allowed, discharge is to an unclassified stream.

Zone of Initial Dilution (ZID): Not allowed, discharge is to an unclassified stream.

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Permit Limits and Information

TMDL WATERSHED: (Y OR N) [N] W.L.A. STUDY CONDUCTED (Y OR N) [N] DISINFECTION REQUIRED: (Y OR N) [N] USE ATTAINABILITY ANALYSIS: (Y OR N) [N]

Outfalls # 001, 002 and 003

WET TEST (Y OR N): [N] FREQUENCY: N/A A.E.C. N/A LIMIT: N/A

PARAMETER	DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MONITORING FREQUENCY
Rainfall(inches/day)	*		*	Once/Quarter
Flow(MGD)	*		*	Once/Quarter
pH(SU)	6 - 9		6 - 9	Once/Quarter
Chemical Oxygen Demand(mg/L)	*		*	Once/Quarter
Total Suspended Solids(mg/L)	*		*	Once/Quarter
Settleable Solids(mL/L/hr)	1.5		1.0	Once/Quarter
Oil & grease(mg/L)	15		10	Once/Quarter
Total Petroleum Hydrocarbons(mg/L)	10		10	Once/Quarter
Benzo(a) anthracine(µg/L)	0.08		0.04	Once/Quarter
Benzo(a) pyrene(µg/L)	0.08		0.04	Once/Quarter
Benzo(k) fluoranthene(µg/L)	0.08		0.04	Once/Quarter
Chrysene(µg/L)	0.08		0.04	Once/Quarter
Indeno (1,2,3 – cd) pyrene(µg/L)	0.08		0.04	Once/Quarter
phenols(µg/L)	164		82	Once/Quarter
Total Toxic Organics(mg/L)	***		***	Once/ 5 Years

* Monitoring only

** These levels are below detection level using EPA method 610. Non-detect readings will be considered acceptable

*** If a constituent is found in a quantity greater than the chronic or acute criteria, appropriate controls shall be immediately taken.

Receiving Water Monitoring Requirements

In-stream monitoring is not recommended at this time.

Derivation and Discussion of Limits

Chemical Oxygen Demand and Settleable Solids: Upon reviewing the monitoring data, provided by consulting firms, previous permits, other file data, and an inspection of the facility and surrounding area and based upon Best Professional Judgment, the limits and monitoring requirements proposed should be protective of the receiving stream and in accord with 10 CSR 20-7.031(4)(G),(H) and (J). See General permit MO-R80R000.

Total Suspended Solids: Total suspended solids have been included as a monitoring requirement due to the concern for the transport of fine materials to the drop inlet receptors based upon Best Professional Judgment.

Ph, Oil & Grease and Total Petroleum Hydrocarbons: standard requirements for an industrial site where petroleum based products have been handled and used outside of enclosures. See 10 CSR 20-7.015 (8) (B) 2. and 10 CSR 20-7.031 (3) (I) 1. and Table A and "Best Professional Judgment".

Benzo(a) anthracine, Benzo(a) pyrene, Benzo(k) fluoranthene, Chrysene, Indeno (1,2,3 – cd) pyrene (Polynuclear Aromatic Hydrocarbons) and Phenols: Standard water quality-based limits for unclassified waters which support Aquatic Life: See 10 CSR 20-7.031 (3) (I) 1. Table A, Polynuclear Aromatic Hydrocarbons for Human Health Proctection(HHF) and Phenol for Aquatic Life.

Parameter	WLA	LTA	MDL	AML
Polynuclear Aromatic Hydrocarbons (µg/L)	0.049	0.0258	0.08031	0.04003
Phenol (µg/L)	100	52.7	163.897	81.685

Total Toxic Organics: Continued from previous permit and "Best Professional Judgment" based upon the lack of credible monitoring data and the concern for creosote-contaminated stormwater to reach Hickory Creek.

. The permit should contain a "re-opener clause" to address potential water quality issues should this or other monitoring data indicate water quality standards are being exceeded, due in part to this discharge.

Reviewer: Ed Pate
Date: June 16, 2006
Unit Chief: Refaat Mefrakis

Monitoring and effluent limits contained within this document have been developed in accordance with EPA guidelines using the best available data and are believed to be consistent with Missouri's Water Quality Standards and Effluent Regulations. If additional water quality data or anecdotal information is available that may affect the recommended monitoring and effluent limits, please forward these data and information to the author.